

## Appendix B

### STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

AMEREN TRANSMISSION COMPANY OF )  
ILLINOIS )  
 ) Docket No. 14-0380  
Petition for an Order Pursuant to Section 8-509 of )  
the Public Utilities Act Authorizing Use of Eminent )  
Domain Power. )

#### AFFIDAVIT OF CARLO S. FORNI

STATE OF TEXAS )  
 ) SS  
COUNTY OF HARRIS )

Carlo S. Forni, first duly sworn upon his oath, deposes and states as follows:

1. My name is Carlo S. Forni and my business address is 11999 Katy Freeway #400, Houston, Texas 77079. I am a Manager/Real Estate Appraiser for Allen, Williford & Seale (AWS). Ameren Transmission Company of Illinois retained AWS in December of 2012 to conduct appraisals to aid in negotiations for land rights necessary for the Illinois Rivers Project.
2. Albert Allen, Bryan Glass and I are the three appraisers who conducted each of the appraisals for the Meredosia – Ipava segment of the Project. We are all Illinois certified and licensed appraisers. I refer to us collectively in this affidavit as “the appraisers.”
3. In its appraisals for the Meredosia – Ipava segment, AWS stated that Robert Dees, Daniel Hughes, Chase Gilbert, and Andrew Langford provided “significant real property appraisal assistance” by “gathering pertinent property and market data” and “compiling [the] report(s).” I refer to these four individuals in this affidavit as “the assistants.”
4. Under direction from the appraisers, the assistants gathered sales information from the supervisor of assessments and the county clerk/recorder in the various counties. These documents included PTAX-203 Illinois Transfer Declarations and deeds. I often provided the

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assistants with a list of documents to retrieve and sometimes accompanied them to gather the information. Upon further instruction, the assistants would gather supporting information for the sales that were gathered from various public sources, including county plat books, GIS websites, or deed calls. They would use the Google Earth program on the computer to create aerial photographs, topographic maps, and flood maps. On occasion, they would obtain flood maps from the FEMA website and soil maps from the Surety Agridata Inc. website. Tax records were retrieved from the internet on occasion. The assistants would then type the collected sales information into our company database. The assistants would gather information on the subject properties to include plats from county plat books, GIS maps if available, tax records, aerial photographs, topographic maps, flood maps, and soil maps. This information was gathered in the same manner as it was for the sales as noted above. The assistants would then compile some of the maps into an addenda for the workfile. They would also type the gathered information into a preliminary template report provided by the appraisers.

5. The appraisers would review and edit the preliminary report typed by the assistants. The appraisers would review and revise the sales information the assistants had gathered and typed in the database.

6. Thus, a more accurate description is that Robert Dees, Daniel Hughes, Chase Gilbert, and Andrew Langford functioned as research assistants to the appraisers by performing data collection, data entry and other clerical tasks (i.e. compiling the supporting documentation and typing the report).

7. While USPAP does not define “significant appraisal assistance,” per guidance from USPAP, the assistants’ activities would not be considered “significant appraisal assistance.” In its frequently asked questions, USPAP clarified that “an individual who merely collects or

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provides data for use in the analysis does not provide significant appraisal assistance.” USPAP Frequently Asked Question No. 247, p. F-114.

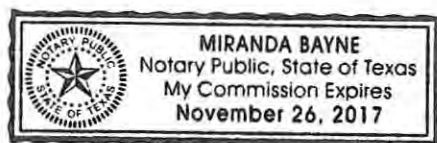
8. Further, Albert Allen, Bryan Glass and I, completed all opinions of value, compensation, and final products. The appraisers performed all the activities considered “significant” by USPAP, including the identification of comparable properties and data, inspection of the subject property and comparables, and development of the opinion of value and compensation. The four assistants did not contribute to the valuation analysis in any way.

9. AWS’s intent in disclosing the names of the research assistants and activities they performed was simply to ensure transparency about who helped the appraisers and in what capacity.

I hereby swear and affirm that the information contained in my Affidavit is true and accurate to the best of my knowledge, information and belief.

Carlo Forni  
Carlo S. Forni

SUBSCRIBED AND SWORN to before me this 17 day of June, 2014.



Miranda Bayne  
NOTARY PUBLIC